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7	
8	UNITED STATES DISTRICT COURT
9	WESTERN DISTRICT OF WASHINGTON AT TACOMA
0	TWIN HARBORS WATERKEEPER,
1	Plaintiff,
, l	v.) COMPLAINT
2	DAHLSTROM LUMBER COMPANY,)
3	INC.
4	Defendant.
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6	I. INTRODUCTION
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8	1. This action is a citizen suit brought under Section 505 of the Clean Water Act
	("CWA") as amended, 33 U.S.C. § 1365. Plaintiff, Twin Harbors Waterkeeper ("Twin
9	Harbors"), seeks a declaratory judgment, injunctive relief, the imposition of civil penalties, and
20	the award of costs, including attorneys' and expert witnesses' fees, for Defendant Dahlstrom
21	Lumber Company, Inc.'s ("Dahlstrom") repeated and ongoing violations of Sections 301(a) and
22	402 of the CWA, 33 U.S.C. §§ 1311(a) and 1342, and the terms and conditions of its National
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	COMPLAINT - 1 SMITH & LOWNEY, PLLC
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Pollutant Discharge Elimination System ("NPDES") permit authorizing certain stormwater discharges of pollutants from Dahlstrom's Hoquiam, Washington facility to navigable waters.

II. JURISDICTION AND VENUE

- 2. The Court has subject matter jurisdiction over Twin Harbors' claims under Section 505(a) of the CWA, 33 U.S.C. § 1365(a). Sections 309(d) and 505(a) and (d) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a) and (d), authorize the relief Twin Harbors requests.
- 3. Under Section 505(b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A), Twin Harbors notified Dahlstrom of Dahlstrom's violations of the CWA and of Twin Harbors' intent to sue under the CWA by letter dated June 4, 2021 and postmarked June 4, 2021 ("Notice Letter"). A copy of the Notice Letter is attached to this complaint as Exhibit 1. The allegations in the Notice Letter are incorporated herein by this reference. In accordance with section 505(b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A) and 40 C.F.R. § 135.2(a)(1), Twin Harbors notified the Administrator of the United States Environmental Protection Agency ("EPA"), the Administrator of EPA Region 10, the Director of the Washington Department of Ecology ("Ecology"), and Dahlstrom's registered agent of its intent to sue Dahlstrom by mailing copies of the Notice Letter to these individuals on June 4, 2021.
- 4. At the time of the filing of this Complaint, more than sixty days have passed since the Notice Letter and copies thereof were issued in the manner described in the preceding paragraph.
- 5. The violations complained of in the Notice Letter are continuing and/or are reasonably likely to re-occur.
- 6. At the time of the filing of this Complaint, neither the EPA nor Ecology has commenced any action constituting diligent prosecution to redress the violations alleged in the Notice Letter.

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7. The source of the violations complained of is located in Grays Harbor County, Washington, within the Western District of Washington, and venue is therefore appropriate in the Western District of Washington under Section 505(c)(1) of the CWA, 33 U.S.C. § 1365(c)(1), and 28 U.S.C. § 1391(b).

III. PARTIES

- 8. Twin Harbors is suing on behalf of itself and its members.
- 9. Twin Harbors is a non-profit corporation organized under the laws of the State of Washington. Twin Harbors is dedicated to protecting and preserving the environment of Washington State, especially the quality of its waters. Twin Harbors is a membership organization and has at least one member who is injured by Dahlstrom's violations.
- 10. Twin Harbors has representational standing to bring this action. Twin Harbors' members are reasonably concerned about the effects of discharges of pollutants, including stormwater from Dahlstrom's facility, on water quality and aquatic species and wildlife that Twin Harbors' members observe, study, use, and enjoy. Twin Harbors' members are further concerned about the effects of discharges from Dahlstrom's facility on human health. In addition, discharges from Dahlstrom's facility lessen Twin Harbors' members' aesthetic enjoyment of nearby areas. Twin Harbors has members who live, work, fish, and recreate around or use the Grays Harbor which is affected by Dahlstrom's discharges. Twin Harbors' members' concerns about the effects of Dahlstrom's discharges are aggravated by Dahlstrom's failure to record and timely report information about its discharges and pollution controls in a timely manner. The recreational, scientific, economic, aesthetic, and/or health interest of Twin Harbors and its members have been, are being, and will be adversely affected by Dahlstrom's violations of the CWA. The relief sought in this lawsuit can redress the injuries to these interests.

- 11. Twin Harbors has organizational standing to bring this action. Twin Harbors has been actively engaged in a variety of educational and advocacy efforts to improve water quality and to address sources of water quality degradation in the waters of Western Washington, including Grays Harbor. As detailed herein and in the Notice Letter, Dahlstrom has failed to comply with numerous requirements of its NPDES permit including completing corrective actions, compliance with water quality standards, monitoring, recordkeeping, reporting, and planning requirements. As a result, Twin Harbors is deprived of information necessary to properly serve its members by providing information and taking appropriate action to advance its mission. Twin Harbors' efforts to educate and advocate for greater environmental protection, and to ensure the success of environmental restoration projects implemented for the benefit of its members are also obstructed. Finally, Twin Harbors and the public are deprived of information that influences members of the public to become members of Twin Harbors, thereby reducing Twin Harbors' membership numbers. Thus, Twin Harbors' organizational interests have been adversely affected by Dahlstrom's violations. These injuries are fairly traceable to Dahlstrom's violations and are redressable by the Court.
- 12. Dahlstrom is a corporation authorized to conduct business under the laws of the State of Washington.
- 13. Dahlstrom owns and operates a commercial lumber yard located at or about the corner of Airport Way & S Adams St, Hoquiam, WA 98550 (referred to herein as the "facility").

IV. LEGAL BACKGROUND

14. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person, unless in compliance with the provisions of the CWA. A discharge of a pollutant from a point source to waters of the United States without authorization by a NPDES permit, issued under Section 402 of the CWA, 33 U.S.C. § 1342, is prohibited.

- 15. The State of Washington has established a federally approved state NPDES program administered by Ecology. Wash. Rev. Code § 90.48.260; Wash. Admin. Code ch. 173-220. This program was approved by the Administrator of the EPA pursuant to Section 402(b) of the CWA, 33 U.S.C. § 1342(b).
- Industrial Stormwater General Permits, most recently on November 20, 2019, effective January 1, 2020, and set to expire December 31, 2024 (the "2020 Permit"). The previous permit was issued December 3, 2014, became effective January 2, 2015, and expired December 31, 2019 (the "2015 Permit"). The 2015 Permit and 2020 Permit (collectively, "the Permits"), contain substantially similar requirements and authorize those that obtain coverage thereunder to discharge stormwater associated with industrial activity, a pollutant under the CWA, and other pollutants contained in the stormwater to waters of the United States subject to certain terms and conditions.
- 17. The Permits impose certain terms and conditions on those covered thereby, including requirements for monitoring and sampling of discharges, reporting and recordkeeping requirements, and restrictions on the quality of stormwater discharges. To reduce and eliminate pollutants in stormwater discharges, the Permits require, among other things, that permittees develop and implement best management practices ("BMPs") and a Stormwater Pollution Prevention Plan ("SWPPP"), and apply all known and reasonable methods of prevention, control, and treatment ("AKART") to discharges. The specific terms and conditions of the Permits are described in detail in the Notice Letter, attached hereto as Exhibit 1 and incorporated herein by this reference.

V. FACTS

- 18. Ecology granted Dahlstrom coverage for the facility under the 2015 Permit under Permit Number WAR000291. Ecology granted subsequent coverage under the 2020 Permit under the same permit number, WAR000291.
- 19. Dahlstrom discharges stormwater and pollutants associated with industrial activity to Grays Harbor.
- 20. Dahlstrom's facility is engaged in industrial activities including operating sawmills and planning mills and is approximately 7.79 acres. Dahlstrom's facility has at least two outfalls that discharge stormwater and other pollutants to Grays Harbor, including a City of Hoquiam Municipal storm drain and a culvert on the southwestern corner of the facility that crosses under Airport Way.
- 21. Dahlstrom has violated and continues to violate the Permits and Sections 301(a) and 402 of the CWA, 33 U.S.C. §§ 1311(a) and 1342, by discharging pollutants in violation of an NPDES Permit. Dahlstrom's violations of the Permits are set forth in sections I through VI of the Notice Letter attached hereto as Exhibit 1 and are incorporated herein by this reference. In particular, and among the other violations described in the Notice letter, Dahlstrom has violated the Permits by failing to comply with water quality standards, failing to comply with AKART standards, failing to implement BMPs to control water quality, failing to implement corrective actions, failing to establishing an adequate SWPPP, failing to collect or analyze quarterly samples, failing to correctly and timely submit Discharge Monitoring Reports (DMRs), failing to correctly and timely submit Annual Reports, failing to comply with sample timing and frequency, failing comply with visual monitoring requirements, failing to record information, failing to retain records, and failing to report permit violations.

22. Dahlstrom discharges stormwater from the facility containing levels of pollutants that exceed the benchmark values established by the Permits, including the days on which Dahlstrom collected samples with the results identified in Table 1, and is likely to continue discharging comparably unacceptable levels of pollutants in its stormwater:

Table 1: Monitoring Point A Benchmark Exceedances									
Quarter in which sample was collected	Turbidity (Benchmark 25 NTU)	Copper (Benchmark 14 μg/L)	Total Suspended Solids (Benchmark 100 mg/L)						
4 th Quarter 2018	115								
1st Quarter 20201	42.0667	Unknown	Unknown						
1st Quarter 2021	34.7								

- 23. The stormwater monitoring data provided in Table 1 shows benchmark exceedances included in the stormwater monitoring results that Dahlstrom submitted to Ecology.
- 24. The Permits requires Dahlstrom's monitoring to be representative of discharges from the facility. The stormwater monitoring results that Dahlstrom routinely submits to Ecology are not representative of the facility's stormwater discharges, as described in detail in section III in the Notice Letter attached hereto as Exhibit 1.
- 25. Dahlstrom's stormwater discharges are causing or contributing to violations of water quality standards and therefore violate the Permits. Discharges from Dahlstrom's facility contribute to the polluted conditions of the waters of the State, including the water quality standards of Grays Harbor. Discharges from Dahlstrom's facility contribute to the ecological impacts that result from the pollution of these waters and to Twin Harbors and its members'

¹ The 2020 Annual Report states that there was a copper and total suspended solids (TSS) exceedance of an unspecified amount in the first quarter of 2020, but this is not reflected in the DMR.

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injuries resulting therefrom. These requirements and Dahlstrom's violations thereof are described in detail in section I of the Notice Letter, attached hereto as <u>Exhibit 1</u>, and incorporated herein by this reference.

- 26. Dahlstrom's exceedances of the benchmark values indicate that Dahlstrom is failing to apply AKART to its discharges and/or is failing to implement an adequate SWPPP and BMPs. Dahlstrom violated and continues to violate the Permits by not developing, modifying, and/or implementing BMPs in accordance with the requirements of the Permits, and/or by not applying AKART to discharges from the facility. These requirements and Dahlstrom's violations thereof are described in detail in section I.B and section II of the Notice Letter, attached as Exhibit 1, and incorporated herein by this reference.
- 27. Dahlstrom has violated and continues to violate the monitoring requirements of the Permits. For example, the Permits require Dahlstrom to sample its stormwater discharges once during every calendar quarter at each distinct point of discharge offsite except for substantially identical outfalls. However, Dahlstrom has failed and is failing to monitor discharges from the two site entrances that discharge to the road and multiple additional places where discharge is leaving the facility, including the culvert at the southwest corner of the facility crossing under Airport Way; Dahlstrom failed to comply with sample timing and frequency prescribed by the Permits by failing to sample from all discharge points; Dahlstrom failed to collect and analyze stormwater samples for all parameters at Monitoring Point A during the second quarter of 2016 and third quarter of 2016, and for oil sheen at Monitoring Point A during the first quarter 2020; Dahlstrom failed to submit timely DMRs for the second quarter 2017, third quarter 2016; Dahlstrom failed to submit an accurate DMR for the first quarter 2020; Dahlstrom failed to timely submit Annual Reports for 2016, 2017, 2018, 2019, and 2020, and has yet to submit any Annual Report for 2016, 2017, and 2018; Dahlstrom failed to submit an

accurate Annual Report in 2020; and Dahlstrom failed to comply with visual monitoring requirements by failing to conduct Industrial Stormwater Monthly Inspection Reports by qualified personnel, including each and every month from June 2016 to February 2020. The monitoring and inspection requirements and Dahlstrom's violations thereof are described in section III of the Notice Letter, attached hereto as <u>Exhibit 1</u>, and incorporated herein by this reference.

- 28. Dahlstrom has not conducted and/or completed the Level One Corrective Action responses as required by the Permits. These requirements of the Permits and Dahlstrom's violations thereof are described in section IV of the Notice Letter, attached hereto as Exhibit 1, and incorporated herein by this reference.
- 29. Condition S8.B of the Permits require a permittee to undertake a Level One Corrective Action whenever it exceeds a benchmark value identified in Condition S5.A, Table 2 of the Permits, as well as Condition S5.B and Table 3 of the Permits. A Level One Corrective Action comprises of conducting an inspection to investigate the cause, review of the SWPPP to ensure permit compliance, revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges, signature and certification of the revised SWPPP, summary of the Level One Corrective Action in the Annual Report, and full implementation of the revised SWPPP as soon as possible, but no later than the DMR due date for the quarter the benchmark was exceeded. Condition S8.A of the 2020 Permit requires that the permittee implement any Level One Corrective Action required by the 2015 Permit.
- 30. Dahlstrom triggered Level One Corrective Action requirements for each benchmark range exceedance identified in Table 1 above. Dahlstrom has violated the requirements of the Permits described above by failing to conduct a Level One Corrective Action

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in accordance with the Permits' conditions, including the required inspection to investigate the cause; review, revision, and certification of the SWPPP; the required implementation of additional BMPs; and the required summarization in the Annual Report, each time during the past five years that its quarterly stormwater sampling results were greater than a benchmark, including the benchmark exceedances listed in Table 1 above. These corrective action requirements and Dahlstrom's violations thereof are described in section IV.A of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

- 31. Dahlstrom has failed and continues to fail to comply with recording and record keeping requirements of the Permits. These requirements and Dahlstrom's violations thereof are described in section V of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.
- 32. Condition S9.E of the Permits requires Dahlstrom to take certain actions, including reporting to Ecology, in the event Dahlstrom is unable to comply with any terms and conditions of the Permits which may endanger human health or the environment. Dahlstrom has failed to comply with these requirements of the Permits by failing to report and subsequently correct permit violations, including each and every time Dahlstrom failed to comply with corrective action requirements as described above in paragraphs 28-30, each and every time Dahlstrom failed to sample a stormwater discharge as described above in paragraph 27, and each and every time Dahlstrom discharged stormwater with amounts of pollutants in excess of the Permit benchmarks as described in paragraphs 22-24 above. These requirements and Dahlstrom's violations thereof are described in section VI of the Notice Letter, attached hereto as Exhibit 1, and incorporated herein by this reference.

- 33. Each of Dahlstrom's violations of the Permits and the CWA are ongoing in that they are currently occurring or are likely to re-occur at least intermittently in the future.
- 34. A significant penalty should be imposed against Dahlstrom pursuant to the penalty factors set forth in 33 U.S.C. § 1319(d).
- 35. Dahlstrom's violations were avoidable had Dahlstrom been diligent in overseeing facility operations and maintenance.
- 36. Dahlstrom has benefited economically as a consequence of its violations and its failure to implement stormwater management improvements at the facility.
- 37. In accordance with Section 505(c)(3) of the CWA, 33 U.S.C. § 1365(c)(3), and 40 C.F.R. § 135.4, Twin Harbors is mailing a copy of this Complaint to the Administrator of the EPA, the Regional Administrator for Region 10 of the EPA, and the Attorney General of the United States.

VI. CAUSE OF ACTION

- 38. The preceding paragraphs and the allegations in the Notice Letter attached hereto as Exhibit 1 are incorporated herein.
- 39. Dahlstrom's violations of the Permits described herein and in the Notice Letter constitute violations of Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342, and violations of "effluent standards or limitations" under the CWA per 33 U.S.C. § 1365(f).
- 40. These violations committed by Dahlstrom are ongoing or are reasonably likely to continue to occur. Any and all additional violations of the Permits and the CWA which occur after those described in Twin Harbors' Notice Letter, but before a final decision in this action, should be considered continuing violations subject to this Complaint.

41. Without the imposition of appropriate civil penalties and the issuance of an injunction, Dahlstrom is likely to continue to violate the Permits and the CWA to the further injury of Twin Harbors, its members, and others.

VII. RELIEF REQUESTED

Wherefore, Twin Harbors respectfully requests that this Court grant the following relief:

- A. Issue a declaratory judgment that Dahlstrom has violated and continues to be in violation of the Permits and Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342;
- B. Enjoin Dahlstrom from operating the facility in a manner that results in further violations of the General Permit and the CWA;
- C. Order Dahlstrom to immediately implement a SWPPP that complies with the 2020 Permit;
- D. Order Dahlstrom to allow Twin Harbors to participate in the development and implementation of Dahlstrom's SWPPP;
- E. Order Dahlstrom to provide Twin Harbors, for a period beginning on the date of the Court's Order and running for three years after Dahlstrom achieves compliance with all of the conditions of the Permits, with copies of all reports and other documents which Dahlstrom submits to Ecology regarding Dahlstrom's coverage under the Permits at the facility at the time these documents are submitted to Ecology;
- F. Order Dahlstrom to take specific actions to remediate the environmental harm caused by its violations;
- G. Order Dahlstrom to pay civil penalties of \$55,800 per day of violation for each violation committed by Dahlstrom, pursuant to Sections 309(d) and 505(a) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a), and 40 C.F.R. § 19 and 19.4;

1	H.	Award Twin Harbors its litigation expenses, including reasonable attorneys' and
2	expert witnes	s fees, as authorized by Section 505(d) of the CWA, 33 U.S.C. § 1365(d), and any
3	other applical	ple authorization; and
4	I.	Award such other relief as this Court deems appropriate.
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6	RESP	ECTFULLY SUBMITTED this 3rd day of September, 2021
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8		SMITH & LOWNEY, PLLC By: By: s/Richard A. Smith Bished A. Swith WSDA #21788
9		Richard A. Smith, WSBA #21788 By: s/Meredith Crafton
10		Meredith Crafton, WSBA #46558 By: <u>s/Savannah Rose</u>
11		Savannah Rose, WSBA #57062 Attorneys for Plaintiff
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15		savannah@smithandlowney.com
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Exhibit 1

SMITH & LOWNEY, PLLC

2317 EAST JOHN STREET SEATTLE, WASHINGTON 98112 (206) 860-2883, FAX (206) 860-4187

June 4, 2021

Via Certified Mail - Return Receipt Requested

Managing Agent Dahlstrom Lumber Co. PO Box 386 Hoquiam, WA 98550-0386

Managing Agent Dahlstrom Lumber Co. 1131 Airport Way Hoquiam, WA 98550-2652

Managing Agent Dahlstrom Lumber Co. 100 Airport Way Hoquiam, WA 98550-2652

Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN

Dear Managing Agent:

We represent Twin Harbors Waterkeeper, P.O. Box 751, Cosmopolis, WA 98537, (206) 293-0574. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days' notice of Twin Harbors Waterkeeper's intent to file a citizen suit against Dahlstrom Lumber Co. ("Dahlstrom"), under section 505 of the Clean Water Act ("CWA"), 33 U.S.C. § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Dahlstrom's National Pollution Discharge Elimination System ("NPDES") permit.

Dahlstrom was granted coverage under the Industrial Stormwater General Permit ("ISGP") issued by the Washington Department of Ecology ("Ecology") effective January 2, 2015 and expired on December 31, 2019, under NPDES No. WAR000291 (the "2015 Permit"). Ecology granted Dahlstrom coverage under the current iteration of the ISGP effective January 1, 2020, set to expire on December 31, 2024 (the "2020 Permit"), which maintains the same permit number: WAR000291.

Dahlstrom has violated and continues to violate effluent standards and limitations under the CWA (see 33 U.S.C. § 1365(a) and (f)) including the terms and conditions of the 2015 Permit and the 2020 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and pollutants from its facility located at or about the corner of Airport Way & S Adams St, Hoquiam, WA 98550; 1131 Airport Way, Hoquiam, WA 98550-2652; and 100 Airport Way, Hoquiam, WA 98550-2652 (the "facility")¹ as described herein, to Grays Harbor via storm drain. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Dahlstrom.

I. COMPLIANCE WITH APPLICABLE STANDARDS

A. Compliance with Water Quality Standards

Condition S10.A of the Permits prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Specifically, Condition S10.A of the Permits require that Dahlstrom's discharges not cause or contribute to an excursion of Washington State water quality standards.

Dahlstrom discharges to Grays Harbor via storm drain. Dahlstrom discharges stormwater that contains elevated levels of turbidity as indicated in Table 1. Moreover, the discharges Dahlstrom has sampled and reported underrepresent the polluted condition of its facility discharges, as explained below. These discharges cause and/or contribute to violations of water quality standards for turbidity in Grays Harbor, and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. *See* WAC 173-201A-260 (including toxics and aesthetics criteria); WAC 173-201A-610 (use designations for marine waters); WAC 173-201-612 (use designations for marine water including Grays Harbor); WAC 173-201A-210 (including criteria for turbidity). Precipitation data from that time period is appended to this Notice of Intent to Sue and identifies these days.

¹ These various addresses for Dahlstrom come from PARIS, the Washington Office of the Secretary of State website, and Google Maps. We intend to sue with regard to all Dahlstrom facilities, if in fact they refer to different locations.

Table 1: Monitoring Point A Benchmark Exceedances								
Quarter in which	Turbidity	Copper	TSS					
sample was collected	(Benchmark: 25 NTU)	(Benchmark μg/L)	(Benchmark 100 mg/L					
4th Quarter 2018	115							
1st Quarter 2020	42.0667	Unknown*	Unknown*					
1st Quarter 2021	34.7							

^{*} The 2020 Annual Report states that there was a copper and a TSS exceedance in the 1st quarter of 2020, but this is not reflected in the DMR.

B. Compliance with AKART Standards

Condition S10.C of the Permits requires Dahlstrom to apply all known and reasonable methods of prevention, control, and treatment ("AKART") to all discharges, including preparation and implementation of an adequate SWPPP and best management practices ("BMPs"). Dahlstrom has violated and continues to violate these conditions by failing to apply AKART to its discharges or to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in Table 1 and as described below in this Notice of Intent to Sue.

Condition S1.A of the Permits requires that all discharges and activities authorized be consistent with the terms and conditions of the Permits. Dahlstrom has violated these conditions by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS

Dahlstrom is in violation of the Permits' SWPPP provisions as follows:

- 1. Condition S3.A of the Permits requires Dahlstrom to develop and implement a SWPPP that contains specified components. Condition S3.A.2 of the 2015 Permit and Condition S3.A.1 of the 2020 Permit require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. Dahlstrom has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.
- 2. Condition S3.A of the Permits requires Dahlstrom to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. Dahlstrom has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, has not been fully implemented, and has not been updated as necessary.
- 3. The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that

the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. *See Stormwater Management Manual for Western Washington*, July 2019, https://fortress.wa.gov/ecy/ezshare/wq/Permits/Flare/2019SWMMWW/Content/Resources/DocsForDownload/2019SWMMWW.pdf. Dahlstrom's SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

- 4. Dahlstrom's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment as mandated. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours, and seasonal variations in business hours or in industrial activities as required.
- 5. Dahlstrom's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.
- 6. Dahlstrom's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these conditions.
- 7. Dahlstrom's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present in

stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

- 8. Dahlstrom's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.
- 9. Condition S3.B.4 of the Permits requires that permittees include in their SWPPPs and implement mandatory BMPs. Dahlstrom is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.
- 10. Dahlstrom's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs. Dahlstrom fails to include operation source control BMPs in the following categories: good housekeeping (including the definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, and material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Dahlstrom will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit). Some of the BMPs that Dahlstrom is failing to implement as evidenced by Ecology inspection reports and photographs include:
 - Failure to vacuum paved surfaces, documented by photographic evidence;
 - Failure to control on-site sources of dust, documented by photographic evidence;
 - Failure to inspect and maintain bag houses to prevent the escape of dust, documented by photographic evidence;
 - Failure to maintain drainage and treatment facilities, documented by photographic evidence:
 - Failure to inspect equipment for leaking fluids, documented by photographic evidence;

- Failure to clean up spills and leaks immediately, documented by photographic evidence;
- Failure to prevent precipitation from accumulating in containment areas or include a plan on how to dispose of water if covering contaminated area is not practical;
- Failure to minimize exposure of material storage areas, documented by photographic evidence;
- Failure to use grading, berming, or curbing to prevent runoff of contaminated flows, documented by photographic evidence;
- Failure to employ methods to eliminate or minimize oil and grease contamination, documented by photographic evidence and the February 6, 2020 Ecology inspection report;
- Failure to minimize sediment loads in stormwater discharges; and
- Failure to remove solids from stormwater collection and conveyance system components.
- 11. Dahlstrom's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers or surface waters and ground waters of the state, including failing to prevent solids from entering the stormwater and discharging off-site.
- 12. Dahlstrom's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff.
- 13. Dahlstrom's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.
- 14. Dahlstrom's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.
- 15. Dahlstrom's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that: identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations; documents why each discharge point is not sampled; identifies each sampling point by its unique identifying number; identifies staff responsible for conducting stormwater sampling; specifies procedures for sampling collection and handling; specifies procedures for sending samples to the a laboratory; identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods; and specifies the procedure for submitting the results to Ecology.

III. MONITORING AND REPORTING VIOLATIONS

A. Failure to Collect Quarterly Samples

Condition S4.B of the Permits requires Dahlstrom to collect a sample of its stormwater discharge once during every calendar quarter. Dahlstrom violated this requirement by failing to collect stormwater samples for Monitoring Point A during the 2nd quarter 2016, 3rd quarter 2016, and 1st quarter 2020.

Condition S4.B.2.c of the 2015 Permit and S4.B.3.a of the 2020 Permit require Dahlstrom to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria but require the collection of a sample even if the criteria cannot be met. The facility has at least several distinct points of discharge off-site: Outfall A, two site entrances that discharge to the road, and multiple additional places where discharge is leaving the facility. Dahlstrom has violated these conditions each and every quarter during the last five years that Dahlstrom was and is required to sample its stormwater discharges in which Dahlstrom failed to collect a quarterly sample from the two site entrances that discharge to the road and multiple additional places where discharge is leaving the facility. These violations will continue until Dahlstrom commences monitoring all distinct points of discharge.

B. Failure to Analyze Quarterly Samples

Condition S5.A.1 of the Permits and Table 3 of the Permits requires Dahlstrom to analyze stormwater samples collected quarterly for turbidity, pH, total copper, total zinc, oil sheen, chemical oxygen demand (COD), and total suspended solids (TSS).

Dahlstrom violated these conditions by failing to analyze stormwater samples at Monitoring Point A as described in Table 2 below:

Table 2: Parameters Not Analyzed for Monitoring Point A					
Monitoring Period	Parameters Not Analyzed				
2nd Quarter 2016	turbidity, pH, oil sheen, copper, zinc, COD, and TSS				
3rd Quarter 2016	turbidity, pH, oil sheen, copper, zinc, COD, and TSS				
1st Quarter 2020	oil sheen				

C. Failure to Correctly and Timely Submit Discharge Monitoring Reports

Condition S9.A of the 2015 Permit and Condition S9.B of the 2020 Permit require Dahlstrom to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Dahlstrom has violated these conditions by failing to submit a DMR within the time prescribed for Monitoring Point A for the 2nd quarter 2016, 3rd quarter 2016, 4th quarter 2016. Dahlstrom continues to violate these conditions by failing to submit a DMR

for Monitoring Point A for the 2nd quarter 2016 and 3rd quarter 2016. Dahlstrom also continues to violate these conditions by submitting an inaccurate DMR in the 1st quarter of 2020, which contradicts the 2020 Annual Report and states that there was not a copper and a TSS exceedance in the 1st quarter of 2020.

D. Failure to Correctly and Timely Submit Annual Reports

Condition S9.B of the 2015 Permit and Condition S9.C of the 2020 Permit require Dahlstrom to submit a complete and accurate Annual Report to Ecology no later than May 15th of each year. The Annual Report must include corrective action documentation as required in Condition S8.B–D of the Permits. If a corrective action is not yet completed at the time of submission of the Annual Report, Dahlstrom must describe the status of any outstanding corrective action. Specific information to be included in the Annual Report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level One, Two, or Three Corrective Actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 Corrective Actions triggered during the previous calendar year, including identification of the date Dahlstrom expects to complete corrective actions.

Dahlstrom violated these conditions by failing to submit an Annual Report within the prescribed time for 2016, 2017, 2018, 2019, and 2020. Dahlstrom continues to violate these conditions by failing to submit an Annual Report for 2016, 2017, and 2018. Dahlstrom also continues to violate these conditions by submitting an inaccurate Annual Report in 2020, which contradicts the 1st quarter 2020 DMR and states that there was a copper and a TSS exceedance in the 1st quarter of 2020.

E. Failure to Comply with Visual Monitoring Requirements

Condition S7.A of the Permits requires that a monthly visual inspection be conducted at the facility by qualified personnel. Condition S7.B of the Permits requires each inspection to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged; observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges; observations for the presence of illicit discharges; a verification that the descriptions of potential pollutant sources required by the permit are accurate; a verification that the site map in the SWPPP reflects current conditions; and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed). Dahlstrom has violated and continues to violate these requirements because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections each and every month.

Condition S7.C of the Permits requires that Dahlstrom record the results of each inspection in an inspection report or checklist that is maintained on-site and documents the observations, verifications, and assessments required. The report/checklist must include the

time and date of the inspection; the locations inspected; a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits; a summary report and schedule of implementation of the remedial actions Dahlstrom plans to take if the site inspection indicates that the facility is out of compliance; the name, title, signature and certification of the person conducting the facility inspection; and a certification and signature of the responsible corporate officer or a duly authorized representative. Dahlstrom is in violation of these requirements because, during the last five years, it failed to prepare and maintain the requisite inspection reports or checklists and failed to make the requisite certifications and summaries.

F. Failure to Comply with Sample Timing and Frequency

Condition S4.B.1.a of the Permits requires that Dahlstrom sample the discharge from each designated location at least once per quarter. Condition S4.B.1.b of the Permits requires that Dahlstrom sample the stormwater discharge from the first fall storm even each year. "First fall storm event" means the first time on or after October 1st of each year that precipitation occurs and results in a stormwater discharge. Condition S4.B.1.c of the Permits requires that Dahlstrom collect samples within the first 12 hours of stormwater discharge events. If it is not possible to collect a sample within the first 12 hours of a stormwater discharge event, the Permittee must collect the sample as soon as practicable after the first 12 hours, and keep documentation with the sampling records explaining why it could not collect samples within the first 12 hours or if it is unknown. Condition S4.B.1.d of the Permits requires Dahlstrom to obtain representative samples. Precipitation data from the last five years is appended to this Notice of Intent to Sue and identifies these days.

Dahlstrom is in violation of this requirement because in addition to failing to sample from all discharge points, mentioned above in section III.A of this Notice of Intent to Sue, the samples are not representative of the facility as documented by observations, photographic evidence, and Ecology inspection reports, including dark brown/gray/black discharges leaving the site, documented by observations, photographic evidence, the February 6, 2020 Ecology inspection report, and the March 11, 2020 Ecology inspection report.

IV. CORRECTIVE ACTION VIOLATIONS

A. Violations of the Level One Requirements

Condition S8.B of the Permits requires Dahlstrom take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range. Condition S5.A, Condition S6.C.2.a, Table 2, and Table 7 of the Permits, as well as Condition S5.B and Table 3 of the Permits establishes the following benchmarks: turbidity 25 NTU; pH 5–9 SU; total copper 14 μ g/L; total zinc 117 μ g/L; no visible oil sheen; TSS 100 mg/L; and COD 120 mg/L.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires that within 14 days of receipt of sampling results that indicate a benchmark

exceedance during a given quarter; or, for parameters other than pH or visible oils sheen, the end of the quarter, whichever is later, Dahlstrom shall: (1) conduct an inspection to investigate the cause; (2) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (3) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges; (4) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits; and (5) and sign, certify, and fully implement the revised SWPPP in accordance with Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Dahlstrom is in violation of the Level One Corrective Action requirements in the Permits. It failed to implement Level One Corrective Action within 14 days of receipt or the end of the quarter for each and every benchmark exceedance including the exceedances in the 4th quarter 2018 on December 11, 2018 for turbidity; 1st quarter of 2020 for turbidity, copper, and TSS; and 1st quarter 2021 on March 24, 2021 for turbidity. Dahlstrom's failures to comply with the Level One Corrective Action requirements include the failure to conduct an inspection to investigate the cause; perform the required review; revision and certification of the SWPPP; perform required implementation of additional BMPs; complete the required summarization in the Annual Report; and sign, certify, and fully implement the revised SWPPP in accordance with Condition S3 of the Permit each and every time for the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range.

V. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS

A. Failure to Record Information

Condition S4.B of the Permits requires Dahlstrom record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Dahlstrom collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why Dahlstrom could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Dahlstrom is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

B. Failure to Retain Records

Condition S9.C of the 2015 Permit and S9.D of the 2020 Permit require Dahlstrom to retain for a minimum of five years a copy of the current Permit, a copy of Dahlstrom's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required

reports, and records of all data used to complete the application for the Permit. Dahlstrom is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

VI. FAILURE TO REPORT PERMIT VIOLATIONS

Condition S9.E of the 2015 Permit and Condition S9.F of the 2020 Permit require Dahlstrom to take certain actions in the event it is unable to comply with any of the terms and conditions of the Permits which may endanger human health or the environment or exceed any numeric effluent limitation in the permit. In such circumstances, Dahlstrom must immediately take action to minimize potential pollution or otherwise stop the noncompliance and correct the problem, and Dahlstrom must immediately notify the appropriate Ecology regional office of the failure to comply. Dahlstrom must then submit a detailed written report to Ecology, including specified details, within 5 days of the time Dahlstrom became aware of the circumstances unless Ecology requests an earlier submission.

Dahlstrom routinely violates these requirements, including each and every time it failed to comply with the corrective action requirements described in section IV of this Notice of Intent to Sue, and each and every time Dahlstrom discharged stormwater with concentrations of pollutants in excess of the Permits benchmarks, as described in Table 1 above. All these violations may endanger human health or the environment.

VII. REQUEST FOR SWPPP

Pursuant to Condition S9.F of the 2015 Permit and Condition S9.G of the 2020 Permit, Twin Harbors Waterkeeper hereby requests that Dahlstrom provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Dahlstrom fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit and Condition S9.G of the 2020 Permit, it will be in violation of that condition, which violation shall also be subject to this Notice of Intent to Sue and any ensuing lawsuit.

VIII. CONCLUSION

The above-described violations reflect those indicated by the information currently available to Twin Harbors Waterkeeper. These violations are ongoing. Twin Harbors Waterkeeper intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), each of the above-described violations subjects the violator to a penalty of up to \$55,800 per day for each violation. In addition to civil penalties, Twin Harbors Waterkeeper will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and

such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Twin Harbors Waterkeeper believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Dahlstrom under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Sincerely,

SMITH & LOWNEY, PLLC

By: <u>s/Richard A. Smith</u> Richard A. Smith Meredith Crafton Savannah Rose

cc: Michael Regan, Administrator, U.S. EPA
Michelle Pirzadeh, Region 10 Administrator, U.S. EPA
Laura Watson, Director, Washington Department of Ecology
Ingram, Zelasko & Goodwin Registered Agents, Inc. (120 E 1st St., Aberdeen, WA 98520-5246)

Date 1/1/16	Inches 0	Date 1/29/16	Inches 0.93	Date 2/26/16	Inches 0.34	Date 3/25/16	Inches 0.16
1/2/16	0	1/30/16	0.32	2/27/16	0.05	3/26/16	0.18
1/3/16	0	1/31/16	0.23	2/28/16	0.61	3/27/16	0.17
1/4/16	0.03	2/1/16	0.11	2/29/16	0.32	3/28/16	0
1/5/16	0.12	2/2/16	0.04	3/1/16	2.17	3/29/16	0
1/6/16	0.08	2/3/16	0.62	3/2/16	0.75	3/30/16	0
1/7/16	0	2/4/16	0.16	3/3/16	0.13	3/31/16	0
1/8/16	0	2/5/16	0.45	3/4/16	0.44	4/1/16	0
1/9/16	0	2/6/16	0.08	3/5/16	0.71	4/2/16	0
1/10/16	0	2/7/16	0	3/6/16	0.6	4/3/16	0.45
1/11/16	0.25	2/8/16	0	3/7/16	0.43	4/4/16	0.08
1/12/16	1.33	2/9/16	0	3/8/16	0.29	4/5/16	0.07
1/13/16	0.2	2/10/16	0.06	3/9/16	2.53	4/6/16	0
1/14/16	0	2/11/16	0.73	3/10/16	0.03	4/7/16	0
1/15/16	0.34	2/12/16	0.42	3/11/16	0.31	4/8/16	0
1/16/16	0.75	2/13/16	1.09	3/12/16	0.83	4/9/16	0
1/17/16	0.55	2/14/16	0.75	3/13/16	0.72	4/10/16	0
1/18/16	0.45	2/15/16	0.6	3/14/16	0.53	4/11/16	0
1/19/16	0.36	2/16/16	0.19	3/15/16	0.2	4/12/16	0.52
1/20/16	0.92	2/17/16	0.21	3/16/16	0	4/13/16	0.35
1/21/16	3.97	2/18/16	0.35	3/17/16	0	4/14/16	0.14
1/22/16	0.35	2/19/16	0.56	3/18/16	0	4/15/16	0
1/23/16	0.18	2/20/16	0.01	3/19/16	0.01	4/16/16	0
1/24/16	0	2/21/16	0.14	3/20/16	0.22	4/17/16	0
1/25/16	0	2/22/16	0.33	3/21/16	0.76	4/18/16	0
1/26/16	0.71	2/23/16	0	3/22/16	0.04	4/19/16	0
1/27/16	1.4	2/24/16	0	3/23/16	0.84	4/20/16	0
1/28/16	0.83	2/25/16	0	3/24/16	0.2	4/21/16	0

Date 4/22/16	Inches 0.33	Date 5/20/16	Inches 0	Date 6/17/16	Inches 0	Date 7/15/16	Inches 0
4/23/16	0.39	5/21/16	0.02	6/18/16	0	7/16/16	0
4/24/16	0.31	5/22/16	0.15	6/19/16	0	7/17/16	0
4/25/16	0.01	5/23/16	0	6/20/16	0	7/18/16	0
4/26/16	0.01	5/24/16	0	6/21/16	0	7/19/16	0.01
4/27/16	0.02	5/25/16	0	6/22/16	0.07	7/20/16	0
4/28/16	0	5/26/16	0	6/23/16	0.14	7/21/16	0
4/29/16	0	5/27/16	0.08	6/24/16	0.01	7/22/16	0.01
4/30/16	0	5/28/16	0.48	6/25/16	0	7/23/16	0
5/1/16	0	5/29/16	0.01	6/26/16	0	7/24/16	0
5/2/16	0	5/30/16	0	6/27/16	0	7/25/16	0
5/3/16	0.02	5/31/16	0	6/28/16	0	7/26/16	0
5/4/16	0.01	6/1/16	0.1	6/29/16	0	7/27/16	0
5/5/16	0	6/2/16	0.12	6/30/16	0	7/28/16	0
5/6/16	0	6/3/16	0	7/1/16	0	7/29/16	0
5/7/16	0	6/4/16	0	7/2/16	0	7/30/16	0
5/8/16	0	6/5/16	0	7/3/16	0.02	7/31/16	0
5/9/16	0	6/6/16	0	7/4/16	0	8/1/16	0
5/10/16	0	6/7/16	0	7/5/16	0	8/2/16	0.03
5/11/16	0	6/8/16	0	7/6/16	0	8/3/16	0
5/12/16	0	6/9/16	0.23	7/7/16	0.15	8/4/16	0
5/13/16	0	6/10/16	0.24	7/8/16	0.04	8/5/16	0
5/14/16	0.06	6/11/16	0.04	7/9/16	0.1	8/6/16	0
5/15/16	0.01	6/12/16	0	7/10/16	0.03	8/7/16	0.16
5/16/16	0	6/13/16	0.09	7/11/16	0.01	8/8/16	0
5/17/16	0	6/14/16	0.09	7/12/16	0	8/9/16	0
5/18/16	0.02	6/15/16	0.01	7/13/16	0	8/10/16	0
5/19/16	0.25	6/16/16	0	7/14/16	0	8/11/16	0
		1		1		1	

Date 8/12/16	Inches 0	Date 9/9/16	Inches 0	Date 10/7/16	Inches 0.04	Date 11/4/16	Inches 0.13
8/13/16	0	9/10/16	0	10/8/16	1.13	11/5/16	2.01
8/14/16	0	9/11/16	0	10/9/16	0.22	11/6/16	0.16
8/15/16	0	9/12/16	0	10/10/16	0	11/7/16	0.12
8/16/16	0	9/13/16	0	10/11/16	0	11/8/16	0.11
8/17/16	0	9/14/16	0	10/12/16	0.39	11/9/16	0.44
8/18/16	0	9/15/16	0	10/13/16	2.5	11/10/16	0
8/19/16	0	9/16/16	0	10/14/16	0.93	11/11/16	0.11
8/20/16	0	9/17/16	0.85	10/15/16	2.11	11/12/16	0.26
8/21/16	0	9/18/16	0.01	10/16/16	0.51	11/13/16	0.65
8/22/16	0	9/19/16	0.12	10/17/16	0.5	11/14/16	0.23
8/23/16	0	9/20/16	0.05	10/18/16	0.08	11/15/16	0.63
8/24/16	0	9/21/16	0	10/19/16	0.55	11/16/16	0.5
8/25/16	0	9/22/16	0	10/20/16	1.6	11/17/16	0.84
8/26/16	0	9/23/16	0.37	10/21/16	0.26	11/18/16	0.07
8/27/16	0	9/24/16	0	10/22/16	0.26	11/19/16	0.45
8/28/16	0	9/25/16	0	10/23/16	0.08	11/20/16	0.94
8/29/16	0	9/26/16	0	10/24/16	0.12	11/21/16	0.26
8/30/16	0	9/27/16	0	10/25/16	0.08	11/22/16	1.1
8/31/16	0.41	9/28/16	0	10/26/16	0.61	11/23/16	0.89
9/1/16	0.86	9/29/16	0	10/27/16	0.17	11/24/16	2.56
9/2/16	0.1	9/30/16	0	10/28/16	0.09	11/25/16	0.34
9/3/16	0.09	10/1/16	0.54	10/29/16	0.28	11/26/16	1.12
9/4/16	0	10/2/16	0.06	10/30/16	0.3	11/27/16	0.42
9/5/16	0.53	10/3/16	0.04	10/31/16	0.7	11/28/16	0.54
9/6/16	0.22	10/4/16	0.5	11/1/16	0.14	11/29/16	0.15
9/7/16	0.03	10/5/16	0.49	11/2/16	0.64	11/30/16	0.11
9/8/16	0.01	10/6/16	0.71	11/3/16	0	12/1/16	0.15

Date 12/2/16	Inches 0.45	Date 12/30/16	Inches 0.02	Date 1/27/17	Inches 0	Date 2/24/17	Inches 0.21
12/3/16	0.49	12/31/16	0.43	1/28/17	0	2/25/17	0.22
12/4/16	0.33	1/1/17	0.06	1/29/17	0.09	2/26/17	0.4
12/5/16	0.54	1/2/17	0	1/30/17	0	2/27/17	0.13
12/6/16	0	1/3/17	0	1/31/17	0	2/28/17	0.08
12/7/16	0	1/4/17	0	2/1/17	0	3/1/17	0.06
12/8/16	0.05	1/5/17	0	2/2/17	0.02	3/2/17	0.65
12/9/16	0.63	1/6/17	0	2/3/17	0.35	3/3/17	0.63
12/10/16	0.54	1/7/17	0	2/4/17	0.73	3/4/17	0.31
12/11/16	0.64	1/8/17	0.65	2/5/17	0.35	3/5/17	0.82
12/12/16	0.51	1/9/17	0.05	2/6/17	0.37	3/6/17	0.3
12/13/16	0.1	1/10/17	0.1	2/7/17	0	3/7/17	1.01
12/14/16	0	1/11/17	0	2/8/17	1.16	3/8/17	0.32
12/15/16	0	1/12/17	0	2/9/17	0.98	3/9/17	1.23
12/16/16	0	1/13/17	0	2/10/17	0.32	3/10/17	0.05
12/17/16	0	1/14/17	0	2/11/17	0.02	3/11/17	0.56
12/18/16	0	1/15/17	0	2/12/17	0	3/12/17	0.05
12/19/16	1.55	1/16/17	0	2/13/17	0	3/13/17	1.3
12/20/16	0.12	1/17/17	1.44	2/14/17	0.38	3/14/17	1.2
12/21/16	0	1/18/17	1.37	2/15/17	1.15	3/15/17	0.28
12/22/16	0.55	1/19/17	1.12	2/16/17	0.09	3/16/17	0.15
12/23/16	0.52	1/20/17	0.04	2/17/17	0.01	3/17/17	1.84
12/24/16	0	1/21/17	0.04	2/18/17	0.07	3/18/17	0.48
12/25/16	0	1/22/17	0.13	2/19/17	0.44	3/19/17	0.01
12/26/16	0.92	1/23/17	0	2/20/17	0.2	3/20/17	0.07
12/27/16	0.64	1/24/17	0	2/21/17	0	3/21/17	0.19
12/28/16	0.02	1/25/17	0	2/22/17	0.02	3/22/17	0.43
12/29/16	0.57	1/26/17	0	2/23/17	0	3/23/17	0.34

Date 3/24/17	Inches 0.41	Date 4/21/17	Inches 0	Date 5/19/17	Inches 0	Date 6/16/17	Inches 0.04
3/25/17	0.14	4/22/17	0.35	5/20/17	0	6/17/17	0.04
3/26/17	0.55	4/23/17	0.57	5/21/17	0	6/18/17	0.01
3/27/17	0.29	4/24/17	0.17	5/22/17	0	6/19/17	0
3/28/17	1.14	4/25/17	0.16	5/23/17	0	6/20/17	0.02
3/29/17	1	4/26/17	0.17	5/24/17	0	6/21/17	0
3/30/17	0.13	4/27/17	0	5/25/17	0	6/22/17	0
3/31/17	0	4/28/17	0	5/26/17	0	6/23/17	0
4/1/17	0.13	4/29/17	0.4	5/27/17	0	6/24/17	0
4/2/17	0.02	4/30/17	0.05	5/28/17	0	6/25/17	0
4/3/17	0	5/1/17	0.15	5/29/17	0	6/26/17	0
4/4/17	0.49	5/2/17	0.32	5/30/17	0	6/27/17	0
4/5/17	0.71	5/3/17	0.15	5/31/17	0.04	6/28/17	0
4/6/17	0.27	5/4/17	0.09	6/1/17	0.05	6/29/17	0
4/7/17	0.71	5/5/17	0.2	6/2/17	0.11	6/30/17	0
4/8/17	0.13	5/6/17	0	6/3/17	0	7/1/17	0
4/9/17	0.07	5/7/17	0	6/4/17	0	7/2/17	0
4/10/17	0.43	5/8/17	0	6/5/17	0	7/3/17	0
4/11/17	0.14	5/9/17	0	6/6/17	0	7/4/17	0
4/12/17	0.49	5/10/17	0.08	6/7/17	0.03	7/5/17	0
4/13/17	0.31	5/11/17	0.86	6/8/17	0.33	7/6/17	0
4/14/17	0.38	5/12/17	0.61	6/9/17	0.24	7/7/17	0
4/15/17	0.02	5/13/17	0.06	6/10/17	0	7/8/17	0
4/16/17	0	5/14/17	0.18	6/11/17	0	7/9/17	0
4/17/17	0.61	5/15/17	0.7	6/12/17	0.03	7/10/17	0
4/18/17	0.44	5/16/17	0.41	6/13/17	0.11	7/11/17	0
4/19/17	0.28	5/17/17	0	6/14/17	0	7/12/17	0
4/20/17	0.44	5/18/17	0	6/15/17	0.98	7/13/17	0.02

Date 7/14/17	Inches 0	Date 8/11/17	Inches 0	Date 9/8/17	Inches 0.02	Date 10/6/17	Inches 0.18
7/15/17	0	8/12/17	0.18	9/9/17	0.05	10/7/17	0.05
7/16/17	0	8/13/17	0.08	9/10/17	0	10/8/17	0.06
7/17/17	0	8/14/17	0	9/11/17	0	10/9/17	0
7/18/17	0	8/15/17	0	9/12/17	0	10/10/17	0.12
7/19/17	0	8/16/17	0	9/13/17	0	10/11/17	0.21
7/20/17	0.08	8/17/17	0	9/14/17	0	10/12/17	0.18
7/21/17	0	8/18/17	0	9/15/17	0	10/13/17	0.01
7/22/17	0	8/19/17	0	9/16/17	0	10/14/17	0
7/23/17	0	8/20/17	0	9/17/17	0.29	10/15/17	0
7/24/17	0	8/21/17	0	9/18/17	0.12	10/16/17	0
7/25/17	0	8/22/17	0	9/19/17	0.65	10/17/17	0.48
7/26/17	0	8/23/17	0	9/20/17	0.81	10/18/17	2.12
7/27/17	0	8/24/17	0	9/21/17	0.01	10/19/17	0.58
7/28/17	0	8/25/17	0	9/22/17	0	10/20/17	0.36
7/29/17	0	8/26/17	0	9/23/17	0.01	10/21/17	2.63
7/30/17	0	8/27/17	0	9/24/17	0.01	10/22/17	0.15
7/31/17	0	8/28/17	0	9/25/17	0.21	10/23/17	0
8/1/17	0	8/29/17	0	9/26/17	0	10/24/17	0
8/2/17	0	8/30/17	0	9/27/17	0	10/25/17	0.17
8/3/17	0	8/31/17	0	9/28/17	0	10/26/17	0
8/4/17	0	9/1/17	0	9/29/17	0.23	10/27/17	0
8/5/17	0	9/2/17	0	9/30/17	0.13	10/28/17	0
8/6/17	0	9/3/17	0	10/1/17	0	10/29/17	0
8/7/17	0	9/4/17	0	10/2/17	0	10/30/17	0
8/8/17	0	9/5/17	0	10/3/17	0	10/31/17	0
8/9/17	0	9/6/17	0	10/4/17	0	11/1/17	0.12
8/10/17	0	9/7/17	0.09	10/5/17	0	11/2/17	0.39

Date 11/3/17	Inches 0.13	Date 12/1/17	Inches 0.76	Date 12/29/17	Inches 1.4	Date 1/26/18	Inches 0.46
11/4/17	0.43	12/2/17	0.82	12/30/17	0.22	1/27/18	0.33
11/5/17	0.13	12/3/17	0	12/31/17	0	1/28/18	0.14
11/6/17	0	12/4/17	0	1/1/18	0	1/29/18	1.16
11/7/17	0	12/5/17	0	1/2/18	0	1/30/18	0.12
11/8/17	0.5	12/6/17	0	1/3/18	0	1/31/18	0.55
11/9/17	0.16	12/7/17	0	1/4/18	0.37	2/1/18	0.97
11/10/17	0.01	12/8/17	0	1/5/18	0.51	2/2/18	0.36
11/11/17	0.55	12/9/17	0	1/6/18	0.01	2/3/18	0.22
11/12/17	1.88	12/10/17	0	1/7/18	0.69	2/4/18	0.55
11/13/17	1.76	12/11/17	0	1/8/18	0.08	2/5/18	0.04
11/14/17	1.62	12/12/17	0	1/9/18	0.08	2/6/18	0
11/15/17	0.8	12/13/17	0	1/10/18	0.35	2/7/18	0
11/16/17	0.31	12/14/17	0	1/11/18	1.93	2/8/18	0.04
11/17/17	0.24	12/15/17	0.05	1/12/18	0.1	2/9/18	0.01
11/18/17	0.02	12/16/17	0.12	1/13/18	0.26	2/10/18	0
11/19/17	1.2	12/17/17	0.49	1/14/18	0	2/11/18	0
11/20/17	0.45	12/18/17	0.47	1/15/18	0.02	2/12/18	0
11/21/17	1.87	12/19/17	1.6	1/16/18	0.03	2/13/18	0.3
11/22/17	0.67	12/20/17	0	1/17/18	0.68	2/14/18	0.21
11/23/17	0.67	12/21/17	0	1/18/18	0.66	2/15/18	0.19
11/24/17	0.18	12/22/17	0.12	1/19/18	0.64	2/16/18	0.37
11/25/17	0.32	12/23/17	0	1/20/18	0.27	2/17/18	0.95
11/26/17	1.08	12/24/17	0.21	1/21/18	0.76	2/18/18	0.08
11/27/17	0.02	12/25/17	0.01	1/22/18	0.17	2/19/18	0
11/28/17	0.61	12/26/17	0	1/23/18	1.72	2/20/18	0.09
11/29/17	0	12/27/17	0.01	1/24/18	0.47	2/21/18	0.01
11/30/17	0.35	12/28/17	1.54	1/25/18	0.37	2/22/18	0

Date 2/23/18	Inches 0.25	Date 3/23/18	Inches 0.31	Date 4/20/18	Inches 0.13	Date 5/18/18	Inches 0
2/24/18	0.12	3/24/18	0.01	4/21/18	0.12	5/19/18	0
2/25/18	0.34	3/25/18	0.03	4/22/18	0	5/20/18	0
2/26/18	0	3/26/18	0.56	4/23/18	0	5/21/18	0
2/27/18	0.18	3/27/18	0.9	4/24/18	0	5/22/18	0
2/28/18	0.65	3/28/18	0	4/25/18	0	5/23/18	0
3/1/18	0.09	3/29/18	0	4/26/18	0	5/24/18	0
3/2/18	0	3/30/18	0	4/27/18	0.16	5/25/18	0
3/3/18	0	3/31/18	0	4/28/18	0.13	5/26/18	0
3/4/18	0.11	4/1/18	0.31	4/29/18	0.13	5/27/18	0
3/5/18	0.03	4/2/18	0.08	4/30/18	0.01	5/28/18	0
3/6/18	0	4/3/18	0.04	5/1/18	0	5/29/18	0
3/7/18	0.07	4/4/18	0.53	5/2/18	0	5/30/18	0
3/8/18	0.69	4/5/18	0.88	5/3/18	0.01	5/31/18	0
3/9/18	0.04	4/6/18	0.07	5/4/18	0.01	6/1/18	0
3/10/18	0	4/7/18	1.08	5/5/18	0	6/2/18	0
3/11/18	0	4/8/18	0.59	5/6/18	0	6/3/18	0.28
3/12/18	0	4/9/18	0.05	5/7/18	0	6/4/18	0.09
3/13/18	0.09	4/10/18	0.32	5/8/18	0.05	6/5/18	0
3/14/18	0.08	4/11/18	0.69	5/9/18	0.08	6/6/18	0
3/15/18	0	4/12/18	0.43	5/10/18	0.17	6/7/18	0
3/16/18	0	4/13/18	1.76	5/11/18	0	6/8/18	0.52
3/17/18	0.07	4/14/18	1.61	5/12/18	0	6/9/18	0.14
3/18/18	0.05	4/15/18	0.39	5/13/18	0	6/10/18	0.26
3/19/18	0	4/16/18	0.62	5/14/18	0	6/11/18	0
3/20/18	0	4/17/18	0.01	5/15/18	0	6/12/18	0
3/21/18	0.19	4/18/18	0	5/16/18	0.03	6/13/18	0.33
3/22/18	0.48	4/19/18	0	5/17/18	0	6/14/18	0.05

Date 6/15/18	Inches 0	Date 7/13/18	Inches 0	Date 8/10/18	Inches 0.01	Date 9/7/18	Inches 0.1
6/16/18	0.03	7/14/18	0	8/11/18	0.07	9/8/18	0
6/17/18	0	7/15/18	0	8/12/18	0	9/9/18	0.13
6/18/18	0	7/16/18	0	8/13/18	0	9/10/18	0.06
6/19/18	0	7/17/18	0	8/14/18	0	9/11/18	0
6/20/18	0	7/18/18	0	8/15/18	0	9/12/18	0.12
6/21/18	0	7/19/18	0	8/16/18	0	9/13/18	0.03
6/22/18	0	7/20/18	0	8/17/18	0	9/14/18	0.14
6/23/18	0	7/21/18	0	8/18/18	0	9/15/18	0.57
6/24/18	0.06	7/22/18	0	8/19/18	0	9/16/18	0.52
6/25/18	0.02	7/23/18	0	8/20/18	0	9/17/18	0
6/26/18	0	7/24/18	0	8/21/18	0	9/18/18	0
6/27/18	0	7/25/18	0	8/22/18	0	9/19/18	0.01
6/28/18	0	7/26/18	0	8/23/18	0	9/20/18	0
6/29/18	0	7/27/18	0	8/24/18	0	9/21/18	0.06
6/30/18	0.14	7/28/18	0	8/25/18	0.02	9/22/18	0.15
7/1/18	0	7/29/18	0	8/26/18	0.05	9/23/18	0
7/2/18	0.01	7/30/18	0	8/27/18	0	9/24/18	0
7/3/18	0	7/31/18	0	8/28/18	0	9/25/18	0
7/4/18	0	8/1/18	0.02	8/29/18	0	9/26/18	0
7/5/18	0	8/2/18	0.04	8/30/18	0	9/27/18	0
7/6/18	0	8/3/18	0.02	8/31/18	0	9/28/18	0
7/7/18	0.05	8/4/18	0	9/1/18	0	9/29/18	0.23
7/8/18	0	8/5/18	0	9/2/18	0	9/30/18	0.03
7/9/18	0	8/6/18	0	9/3/18	0	10/1/18	0.57
7/10/18	0	8/7/18	0	9/4/18	0	10/2/18	0
7/11/18	0	8/8/18	0	9/5/18	0	10/3/18	0
7/12/18	0	8/9/18	0	9/6/18	0	10/4/18	0
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Date 10/5/18	Inches 0.62	Date 11/2/18	Inches 0.21	Date 11/30/18	Inches 0.79	Date 12/28/18	Inches 1.7
10/6/18	0	11/3/18	0.75	12/1/18	0.15	12/29/18	1.22
10/7/18	0.52	11/4/18	0.49	12/2/18	0	12/30/18	0.06
10/8/18	0.06	11/5/18	0.33	12/3/18	0	12/31/18	0
10/9/18	0	11/6/18	0.02	12/4/18	0	1/1/19	0
10/10/18	0	11/7/18	0	12/5/18	0	1/2/19	0.01
10/11/18	0	11/8/18	0	12/6/18	0	1/3/19	1.32
10/12/18	0	11/9/18	0	12/7/18	0.04	1/4/19	0.26
10/13/18	0	11/10/18	0	12/8/18	0.01	1/5/19	0.22
10/14/18	0	11/11/18	0	12/9/18	0.46	1/6/19	0.76
10/15/18	0	11/12/18	0	12/10/18	0.1	1/7/19	0.07
10/16/18	0	11/13/18	0.01	12/11/18	1.91	1/8/19	0.33
10/17/18	0	11/14/18	0.08	12/12/18	0.85	1/9/19	0.41
10/18/18	0	11/15/18	0.01	12/13/18	1	1/10/19	0.03
10/19/18	0	11/16/18	0.04	12/14/18	0.27	1/11/19	0
10/20/18	0	11/17/18	0	12/15/18	0.05	1/12/19	0
10/21/18	0	11/18/18	0	12/16/18	1.11	1/13/19	0
10/22/18	0	11/19/18	0	12/17/18	0.95	1/14/19	0
10/23/18	0.04	11/20/18	0	12/18/18	0.37	1/15/19	0
10/24/18	0.07	11/21/18	0.67	12/19/18	0.03	1/16/19	0.2
10/25/18	1.38	11/22/18	0.75	12/20/18	0.45	1/17/19	0.36
10/26/18	0.22	11/23/18	0.31	12/21/18	0.1	1/18/19	1.55
10/27/18	1.45	11/24/18	0	12/22/18	0.54	1/19/19	0.19
10/28/18	0.32	11/25/18	0.1	12/23/18	0.35	1/20/19	0
10/29/18	0.35	11/26/18	2.52	12/24/18	0	1/21/19	0
10/30/18	0.64	11/27/18	0.28	12/25/18	0	1/22/19	1.36
10/31/18	0.46	11/28/18	0.34	12/26/18	0.61	1/23/19	0.12
11/1/18	0.32	11/29/18	0	12/27/18	0.09	1/24/19	0.03
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Date 1/25/19	Inches 0	Date 2/22/19	Inches 0.65	Date 3/22/19	Inches 0.09	Date 4/19/19	Inches 0.07
1/26/19	0	2/23/19	0.36	3/23/19	0.01	4/20/19	0
1/27/19	0	2/24/19	0.03	3/24/19	0	4/21/19	0
1/28/19	0	2/25/19	0	3/25/19	0.35	4/22/19	0.42
1/29/19	0	2/26/19	0	3/26/19	0.02	4/23/19	0.1
1/30/19	0	2/27/19	0.02	3/27/19	0.12	4/24/19	0
1/31/19	0	2/28/19	0	3/28/19	0	4/25/19	0
2/1/19	0.65	3/1/19	0	3/29/19	0	4/26/19	0
2/2/19	0.04	3/2/19	0	3/30/19	0	4/27/19	0.01
2/3/19	0.05	3/3/19	0	3/31/19	0	4/28/19	0
2/4/19	0	3/4/19	0	4/1/19	0	4/29/19	0
2/5/19	0	3/5/19	0	4/2/19	0.04	4/30/19	0
2/6/19	0	3/6/19	0	4/3/19	0.13	5/1/19	0
2/7/19	0	3/7/19	0.55	4/4/19	0.02	5/2/19	0
2/8/19	0.3	3/8/19	0.15	4/5/19	0.33	5/3/19	0
2/9/19	0.04	3/9/19	0	4/6/19	0.52	5/4/19	0
2/10/19	0.21	3/10/19	0	4/7/19	0.11	5/5/19	0
2/11/19	1.11	3/11/19	0.48	4/8/19	0.24	5/6/19	0
2/12/19	0.23	3/12/19	0.16	4/9/19	0.02	5/7/19	0
2/13/19	0.11	3/13/19	0.01	4/10/19	0.52	5/8/19	0
2/14/19	0.39	3/14/19	0.02	4/11/19	0.38	5/9/19	0
2/15/19	0.27	3/15/19	0	4/12/19	0.04	5/10/19	0
2/16/19	0.05	3/16/19	0	4/13/19	0.41	5/11/19	0
2/17/19	0	3/17/19	0	4/14/19	0.18	5/12/19	0
2/18/19	0.01	3/18/19	0	4/15/19	0.13	5/13/19	0
2/19/19	0.5	3/19/19	0	4/16/19	0.27	5/14/19	0.21
2/20/19	0.05	3/20/19	0	4/17/19	0.05	5/15/19	0.21
2/21/19	0	3/21/19	0	4/18/19	0.29	5/16/19	0.32

5/19/19 0.2 6/16/19 0 7/14/19 0 8/11/19 0 5/20/19 0.1 6/17/19 0 7/15/19 0.08 8/12/19 0 5/21/19 0 6/18/19 0 7/16/19 0 8/13/19 0 5/22/19 0 6/19/19 0 7/16/19 0 8/13/19 0 5/22/19 0 6/20/19 0.01 7/18/19 0.01 8/15/19 0 5/23/19 0 6/20/19 0.01 7/18/19 0.01 8/15/19 0 5/24/19 0.01 6/21/19 0 7/19/19 0 8/16/19 0 5/25/19 0.04 6/22/19 0 7/20/19 0 8/18/19 0 5/26/19 0 6/23/19 0 7/21/19 0 8/18/19 0 5/28/19 0 6/24/19 0 7/22/19 0 8/20/19 0 5/28/19 0.01 6	Date 5/17/19	Inches 0.05	Date 6/14/19	Inches 0	Date 7/12/19	Inches 0	Date 8/9/19	Inches 0
5/20/19 0.1 6/17/19 0 7/15/19 0.08 8/12/19 0 5/21/19 0 6/18/19 0 7/16/19 0 8/13/19 0 5/22/19 0 6/19/19 0 7/16/19 0.11 8/14/19 0 5/23/19 0 6/20/19 0.01 7/18/19 0.01 8/15/19 0 5/24/19 0.01 6/21/19 0 7/19/19 0 8/16/19 0 5/25/19 0.04 6/22/19 0 7/20/19 0 8/18/19 0 5/26/19 0 6/23/19 0 7/21/19 0 8/18/19 0 5/27/19 0 6/24/19 0 7/22/19 0 8/19/19 0.02 5/28/19 0 6/25/19 0 7/23/19 0 8/20/19 0 5/29/19 0 6/25/19 0 7/25/19 0 8/21/19 0.15 5/31/19 0 6/2	5/18/19	0.05	6/15/19	0	7/13/19	0	8/10/19	0.03
5/21/19 0 6/18/19 0 7/16/19 0 8/13/19 0 5/22/19 0 6/19/19 0 7/17/19 0.11 8/14/19 0 5/23/19 0 6/20/19 0.01 7/18/19 0.01 8/15/19 0 5/24/19 0.01 6/21/19 0 7/19/19 0 8/16/19 0 5/26/19 0.04 6/22/19 0 7/20/19 0 8/17/19 0 5/26/19 0 6/23/19 0 7/21/19 0 8/18/19 0 5/27/19 0 6/24/19 0 7/22/19 0 8/19/19 0.02 5/28/19 0 6/25/19 0 7/23/19 0 8/20/19 0 5/29/19 0.01 6/26/19 0 7/24/19 0 8/21/19 0.15 5/30/19 0 6/27/19 0.09 7/25/19 0 8/23/19 0 5/31/19 0 6/	5/19/19	0.2	6/16/19	0	7/14/19	0	8/11/19	0
5/22/19 0 6/19/19 0 7/17/19 0.11 8/14/19 0 5/23/19 0 6/20/19 0.01 7/18/19 0.01 8/15/19 0 5/24/19 0.01 6/21/19 0 7/19/19 0 8/16/19 0 5/25/19 0.04 6/22/19 0 7/20/19 0 8/16/19 0 5/26/19 0 6/23/19 0 7/21/19 0 8/18/19 0 5/27/19 0 6/24/19 0 7/22/19 0 8/19/19 0.02 5/28/19 0 6/25/19 0 7/23/19 0 8/20/19 0 5/28/19 0 6/26/19 0 7/24/19 0 8/20/19 0 5/29/19 0.01 6/26/19 0 7/25/19 0 8/21/19 0.19 5/30/19 0 6/27/19 0.09 7/25/19 0 8/23/19 0 6/19 0 6/29/	5/20/19	0.1	6/17/19	0	7/15/19	0.08	8/12/19	0
5/23/19 0 6/20/19 0.01 7/18/19 0.01 8/15/19 0 5/24/19 0.01 6/21/19 0 7/19/19 0 8/16/19 0 5/25/19 0.04 6/22/19 0 7/20/19 0 8/17/19 0 5/26/19 0 6/23/19 0 7/21/19 0 8/18/19 0 5/27/19 0 6/24/19 0 7/22/19 0 8/19/19 0.02 5/28/19 0 6/25/19 0 7/23/19 0 8/20/19 0 5/29/19 0.01 6/26/19 0 7/24/19 0 8/21/19 0.19 5/30/19 0 6/27/19 0.09 7/25/19 0 8/22/19 0 5/31/19 0 6/27/19 0.09 7/26/19 0 8/23/19 0 6/19 0 6/29/19 0 7/27/19 0.02 8/24/19 0.02 6/2/19 0	5/21/19	0	6/18/19	0	7/16/19	0	8/13/19	0
5/24/19 0.01 6/21/19 0 7/19/19 0 8/16/19 0 5/25/19 0.04 6/22/19 0 7/20/19 0 8/17/19 0 5/26/19 0 6/23/19 0 7/21/19 0 8/18/19 0 5/27/19 0 6/24/19 0 7/22/19 0 8/19/19 0.02 5/28/19 0 6/25/19 0 7/23/19 0 8/20/19 0 5/29/19 0.01 6/26/19 0 7/24/19 0 8/21/19 0 5/30/19 0 6/27/19 0.09 7/25/19 0 8/22/19 0 5/31/19 0 6/28/19 0 7/26/19 0 8/23/19 0 6/1/19 0 6/28/19 0 7/27/19 0.02 8/24/19 0.02 6/2/19 0 6/29/19 0 7/27/19 0.02 8/25/19 0 6/3/19 0 7/3/19 </td <td>5/22/19</td> <td>0</td> <td>6/19/19</td> <td>0</td> <td>7/17/19</td> <td>0.11</td> <td>8/14/19</td> <td>0</td>	5/22/19	0	6/19/19	0	7/17/19	0.11	8/14/19	0
5/25/19 0.04 6/22/19 0 7/20/19 0 8/17/19 0 5/26/19 0 6/23/19 0 7/21/19 0 8/18/19 0 5/26/19 0 6/24/19 0 7/22/19 0 8/19/19 0.02 5/28/19 0 6/25/19 0 7/23/19 0 8/20/19 0 5/28/19 0.01 6/25/19 0 7/24/19 0 8/20/19 0 5/29/19 0.01 6/26/19 0 7/24/19 0 8/21/19 0.15 5/30/19 0 6/27/19 0.09 7/25/19 0 8/22/19 0 5/31/19 0 6/28/19 0 7/26/19 0 8/23/19 0 6/19 0 6/29/19 0 7/27/19 0.02 8/24/19 0.02 6/2/19 0 6/30/19 0 7/29/19 0 8/26/19 0 6/31/19 0 7/2/19 <td>5/23/19</td> <td>0</td> <td>6/20/19</td> <td>0.01</td> <td>7/18/19</td> <td>0.01</td> <td>8/15/19</td> <td>0</td>	5/23/19	0	6/20/19	0.01	7/18/19	0.01	8/15/19	0
5/26/19 0 6/23/19 0 7/21/19 0 8/18/19 0 5/27/19 0 6/24/19 0 7/22/19 0 8/19/19 0.02 5/28/19 0 6/25/19 0 7/23/19 0 8/20/19 0 5/29/19 0.01 6/26/19 0 7/24/19 0 8/21/19 0.19 5/30/19 0 6/26/19 0.09 7/25/19 0 8/22/19 0 5/31/19 0 6/28/19 0 7/26/19 0 8/23/19 0 6/1/19 0 6/28/19 0 7/26/19 0 8/23/19 0 6/2/19 0 6/29/19 0 7/27/19 0.02 8/24/19 0.02 6/2/19 0 6/30/19 0 7/28/19 0 8/25/19 0 6/3/19 0 7/2/19 0 7/29/19 0 8/26/19 0 6/5/19 0 7/3/19	5/24/19	0.01	6/21/19	0	7/19/19	0	8/16/19	0
5/27/19 0 6/24/19 0 7/22/19 0 8/19/19 0.02 5/28/19 0 6/25/19 0 7/23/19 0 8/20/19 0 5/29/19 0.01 6/26/19 0 7/24/19 0 8/21/19 0.19 5/30/19 0 6/27/19 0.09 7/25/19 0 8/22/19 0 5/31/19 0 6/28/19 0 7/26/19 0 8/23/19 0 6/1/19 0 6/28/19 0 7/26/19 0 8/23/19 0 6/1/19 0 6/29/19 0 7/27/19 0.02 8/24/19 0.02 6/2/19 0 6/30/19 0 7/28/19 0 8/25/19 0 6/3/19 0 7/19 0 7/29/19 0 8/26/19 0 6/5/19 0 7/3/19 0 7/31/19 0 8/28/19 0 6/6/19 0.16 7/4/19	5/25/19	0.04	6/22/19	0	7/20/19	0	8/17/19	0
5/28/19 0 6/25/19 0 7/23/19 0 8/20/19 0 5/29/19 0.01 6/26/19 0 7/24/19 0 8/21/19 0.19 5/30/19 0 6/27/19 0.09 7/25/19 0 8/22/19 0 5/31/19 0 6/28/19 0 7/26/19 0 8/23/19 0 6/1/19 0 6/29/19 0 7/26/19 0 8/23/19 0 6/2/19 0 6/29/19 0 7/27/19 0.02 8/24/19 0.02 6/2/19 0 6/30/19 0 7/28/19 0 8/25/19 0 6/3/19 0 7/2/19 0 7/29/19 0 8/26/19 0 6/4/19 0 7/2/19 0 7/30/19 0 8/27/19 0 6/5/19 0 7/3/19 0 7/31/19 0 8/28/19 0 6/6/19 0.16 7/4/19 <	5/26/19	0	6/23/19	0	7/21/19	0	8/18/19	0
5/29/19 0.01 6/26/19 0 7/24/19 0 8/21/19 0.19 5/30/19 0 6/27/19 0.09 7/25/19 0 8/22/19 0 5/31/19 0 6/28/19 0 7/26/19 0 8/23/19 0 6/1/19 0 6/29/19 0 7/27/19 0.02 8/24/19 0.02 6/2/19 0 6/30/19 0 7/28/19 0 8/25/19 0 6/2/19 0 6/30/19 0 7/28/19 0 8/25/19 0 6/3/19 0 7/1/19 0 7/29/19 0 8/26/19 0 6/4/19 0 7/2/19 0 7/30/19 0 8/27/19 0 6/5/19 0 7/3/19 0 7/31/19 0 8/28/19 0 6/6/19 0.16 7/4/19 0 8/1/19 0.01 8/29/19 0.03 6/7/19 0.48 7/5/19	5/27/19	0	6/24/19	0	7/22/19	0	8/19/19	0.02
5/30/19 0 6/27/19 0.09 7/25/19 0 8/22/19 0 5/31/19 0 6/28/19 0 7/26/19 0 8/23/19 0 6/1/19 0 6/29/19 0 7/27/19 0.02 8/24/19 0.02 6/2/19 0 6/30/19 0 7/28/19 0 8/25/19 0 6/3/19 0 7/1/19 0 7/29/19 0 8/26/19 0 6/4/19 0 7/2/19 0 7/30/19 0 8/27/19 0 6/5/19 0 7/3/19 0 7/31/19 0 8/28/19 0 6/6/19 0.16 7/4/19 0 8/19 0.01 8/29/19 0.03 6/7/19 0.48 7/5/19 0.02 8/2/19 0.06 8/30/19 0 6/8/19 0 7/6/19 0.08 8/3/19 0 8/31/19 0.01 6/9/19 0 7/8/19	5/28/19	0	6/25/19	0	7/23/19	0	8/20/19	0
5/31/19 0 6/28/19 0 7/26/19 0 8/23/19 0 6/1/19 0 6/29/19 0 7/27/19 0.02 8/24/19 0.02 6/2/19 0 6/30/19 0 7/28/19 0 8/25/19 0 6/3/19 0 7/1/19 0 7/29/19 0 8/26/19 0 6/4/19 0 7/2/19 0 7/30/19 0 8/26/19 0 6/5/19 0 7/3/19 0 7/31/19 0 8/27/19 0 6/6/19 0.16 7/4/19 0 8/1/19 0.01 8/29/19 0.03 6/7/19 0.48 7/5/19 0.02 8/2/19 0.06 8/30/19 0 6/8/19 0 7/6/19 0.08 8/3/19 0 8/31/19 0.01 6/9/19 0 7/8/19 0.06 8/5/19 0 9/2/19 0 6/10/19 0 7/9/19	5/29/19	0.01	6/26/19	0	7/24/19	0	8/21/19	0.19
6/1/19 0 6/29/19 0 7/27/19 0.02 8/24/19 0.02 6/2/19 0 6/30/19 0 7/28/19 0 8/25/19 0 6/3/19 0 7/1/19 0 7/28/19 0 8/26/19 0 6/4/19 0 7/2/19 0 7/30/19 0 8/27/19 0 6/5/19 0 7/3/19 0 7/31/19 0 8/28/19 0 6/6/19 0.16 7/4/19 0 8/1/19 0.01 8/29/19 0.03 6/7/19 0.48 7/5/19 0.02 8/2/19 0.06 8/30/19 0 6/8/19 0 7/6/19 0.08 8/3/19 0 8/31/19 0.01 6/9/19 0 7/7/19 0.03 8/4/19 0 9/1/19 0 6/10/19 0 7/8/19 0.06 8/5/19 0 9/2/19 0 6/11/19 0 7/9/19	5/30/19	0	6/27/19	0.09	7/25/19	0	8/22/19	0
6/2/19 0 6/30/19 0 7/28/19 0 8/25/19 0 6/3/19 0 7/1/19 0 7/29/19 0 8/26/19 0 6/4/19 0 7/2/19 0 7/30/19 0 8/27/19 0 6/5/19 0 7/3/19 0 7/31/19 0 8/28/19 0 6/6/19 0.16 7/4/19 0 8/1/19 0.01 8/29/19 0.03 6/7/19 0.48 7/5/19 0.02 8/2/19 0.06 8/30/19 0 6/8/19 0 7/6/19 0.08 8/3/19 0 8/31/19 0.01 6/9/19 0 7/7/19 0.03 8/4/19 0 9/1/19 0 6/10/19 0 7/8/19 0.06 8/5/19 0 9/2/19 0 6/11/19 0 7/9/19 0.4 8/6/19 0 9/3/19 0 6/12/19 0 7/10/19 0.35 8/7/19 0 9/4/19 0	5/31/19	0	6/28/19	0	7/26/19	0	8/23/19	0
6/3/19 0 7/1/19 0 7/29/19 0 8/26/19 0 6/4/19 0 7/2/19 0 7/30/19 0 8/27/19 0 6/5/19 0 7/3/19 0 7/31/19 0 8/28/19 0 6/6/19 0.16 7/4/19 0 8/1/19 0.01 8/29/19 0.03 6/7/19 0.48 7/5/19 0.02 8/2/19 0.06 8/30/19 0 6/8/19 0 7/6/19 0.08 8/3/19 0 8/31/19 0.01 6/9/19 0 7/7/19 0.03 8/4/19 0 9/1/19 0 6/10/19 0 7/8/19 0.06 8/5/19 0 9/2/19 0 6/11/19 0 7/9/19 0.4 8/6/19 0 9/3/19 0 6/12/19 0 7/10/19 0.35 8/7/19 0 9/4/19 0	6/1/19	0	6/29/19	0	7/27/19	0.02	8/24/19	0.02
6/4/19 0 7/2/19 0 7/30/19 0 8/27/19 0 6/5/19 0 7/3/19 0 7/31/19 0 8/28/19 0 6/6/19 0.16 7/4/19 0 8/1/19 0.01 8/29/19 0.03 6/7/19 0.48 7/5/19 0.02 8/2/19 0.06 8/30/19 0 6/8/19 0 7/6/19 0.08 8/3/19 0 8/31/19 0.01 6/9/19 0 7/7/19 0.03 8/4/19 0 9/1/19 0 6/10/19 0 7/8/19 0.06 8/5/19 0 9/2/19 0 6/11/19 0 7/9/19 0.4 8/6/19 0 9/3/19 0 6/12/19 0 7/10/19 0.35 8/7/19 0 9/4/19 0	6/2/19	0	6/30/19	0	7/28/19	0	8/25/19	0
6/5/19 0 7/3/19 0 7/31/19 0 8/28/19 0 6/6/19 0.16 7/4/19 0 8/1/19 0.01 8/29/19 0.03 6/7/19 0.48 7/5/19 0.02 8/2/19 0.06 8/30/19 0 6/8/19 0 7/6/19 0.08 8/3/19 0 8/31/19 0.01 6/9/19 0 7/7/19 0.03 8/4/19 0 9/1/19 0 6/10/19 0 7/8/19 0.06 8/5/19 0 9/2/19 0 6/11/19 0 7/9/19 0.4 8/6/19 0 9/3/19 0 6/12/19 0 7/10/19 0.35 8/7/19 0 9/4/19 0	6/3/19	0	7/1/19	0	7/29/19	0	8/26/19	0
6/6/19 0.16 7/4/19 0 8/1/19 0.01 8/29/19 0.03 6/7/19 0.48 7/5/19 0.02 8/2/19 0.06 8/30/19 0 6/8/19 0 7/6/19 0.08 8/3/19 0 8/31/19 0.01 6/9/19 0 7/7/19 0.03 8/4/19 0 9/1/19 0 6/10/19 0 7/8/19 0.06 8/5/19 0 9/2/19 0 6/11/19 0 7/9/19 0.4 8/6/19 0 9/3/19 0 6/12/19 0 7/10/19 0.35 8/7/19 0 9/4/19 0	6/4/19	0	7/2/19	0	7/30/19	0	8/27/19	0
6/7/19 0.48 7/5/19 0.02 8/2/19 0.06 8/30/19 0 6/8/19 0 7/6/19 0.08 8/3/19 0 8/31/19 0.01 6/9/19 0 7/7/19 0.03 8/4/19 0 9/1/19 0 6/10/19 0 7/8/19 0.06 8/5/19 0 9/2/19 0 6/11/19 0 7/9/19 0.4 8/6/19 0 9/3/19 0 6/12/19 0 7/10/19 0.35 8/7/19 0 9/4/19 0	6/5/19	0	7/3/19	0	7/31/19	0	8/28/19	0
6/8/19 0 7/6/19 0.08 8/3/19 0 8/31/19 0.01 6/9/19 0 7/7/19 0.03 8/4/19 0 9/1/19 0 6/10/19 0 7/8/19 0.06 8/5/19 0 9/2/19 0 6/11/19 0 7/9/19 0.4 8/6/19 0 9/3/19 0 6/12/19 0 7/10/19 0.35 8/7/19 0 9/4/19 0	6/6/19	0.16	7/4/19	0	8/1/19	0.01	8/29/19	0.03
6/9/19 0 7/7/19 0.03 8/4/19 0 9/1/19 0 6/10/19 0 7/8/19 0.06 8/5/19 0 9/2/19 0 6/11/19 0 7/9/19 0.4 8/6/19 0 9/3/19 0 6/12/19 0 7/10/19 0.35 8/7/19 0 9/4/19 0	6/7/19	0.48	7/5/19	0.02	8/2/19	0.06	8/30/19	0
6/10/19 0 7/8/19 0.06 8/5/19 0 9/2/19 0 6/11/19 0 7/9/19 0.4 8/6/19 0 9/3/19 0 6/12/19 0 7/10/19 0.35 8/7/19 0 9/4/19 0	6/8/19	0	7/6/19	0.08	8/3/19	0	8/31/19	0.01
6/11/19 0 7/9/19 0.4 8/6/19 0 9/3/19 0 6/12/19 0 7/10/19 0.35 8/7/19 0 9/4/19 0	6/9/19	0	7/7/19	0.03	8/4/19	0	9/1/19	0
6/12/19 0 7/10/19 0.35 8/7/19 0 9/4/19 0	6/10/19	0	7/8/19	0.06	8/5/19	0	9/2/19	0
	6/11/19	0	7/9/19	0.4	8/6/19	0	9/3/19	0
6/13/19 0 7/11/19 0.04 8/8/19 0.01 9/5/19 0	6/12/19	0	7/10/19	0.35	8/7/19	0	9/4/19	0
	6/13/19	0	7/11/19	0.04	8/8/19	0.01	9/5/19	0

Date 9/6/19	Inches 0	Date 10/4/19	Inches 0.1	Date 11/1/19	Inches 0	Date 11/29/19	Inches 0
9/7/19	0	10/5/19	0	11/2/19	0	11/30/19	0
9/8/19	0.3	10/6/19	0	11/3/19	0	12/1/19	0.14
9/9/19	0.78	10/7/19	0.27	11/4/19	0	12/2/19	0
9/10/19	0	10/8/19	0.1	11/5/19	0	12/3/19	0
9/11/19	0	10/9/19	0	11/6/19	0	12/4/19	0.09
9/12/19	1.02	10/10/19	0	11/7/19	0	12/5/19	0
9/13/19	0.01	10/11/19	0	11/8/19	0	12/6/19	0.29
9/14/19	0.43	10/12/19	0	11/9/19	0.5	12/7/19	0.46
9/15/19	0.34	10/13/19	0	11/10/19	0	12/8/19	0
9/16/19	0.14	10/14/19	0	11/11/19	0	12/9/19	0
9/17/19	0.45	10/15/19	0.11	11/12/19	0.44	12/10/19	0.22
9/18/19	0	10/16/19	1.07	11/13/19	0	12/11/19	0.71
9/19/19	0.01	10/17/19	0.39	11/14/19	0	12/12/19	0.34
9/20/19	0	10/18/19	0.52	11/15/19	0.44	12/13/19	0.35
9/21/19	0	10/19/19	0.69	11/16/19	0.04	12/14/19	0.06
9/22/19	0.46	10/20/19	0.32	11/17/19	0.92	12/15/19	0
9/23/19	0.15	10/21/19	1.18	11/18/19	0.72	12/16/19	0.13
9/24/19	0.02	10/22/19	0.01	11/19/19	0	12/17/19	0
9/25/19	0	10/23/19	0	11/20/19	0	12/18/19	0.48
9/26/19	0.16	10/24/19	0	11/21/19	0	12/19/19	1.74
9/27/19	0.19	10/25/19	0.03	11/22/19	0	12/20/19	2.35
9/28/19	0	10/26/19	0	11/23/19	0.22	12/21/19	0.19
9/29/19	0	10/27/19	0	11/24/19	0.08	12/22/19	0
9/30/19	0	10/28/19	0	11/25/19	0.06	12/23/19	0.03
10/1/19	0	10/29/19	0	11/26/19	0.04	12/24/19	0.28
10/2/19	0.07	10/30/19	0	11/27/19	0	12/25/19	0.05
10/3/19	0.26	10/31/19	0	11/28/19	0	12/26/19	0.14

Date 12/27/19	Inches 0.08	Date 1/24/20	Inches 0.4	Date 2/21/20	Inches 0	Date 3/20/20	Inches 0
12/28/19	0.04	1/25/20	0.38	2/22/20	0.13	3/21/20	0
12/29/19	0.17	1/26/20	0.45	2/23/20	0.36	3/22/20	0
12/30/19	0.01	1/27/20	1.43	2/24/20	0	3/23/20	0.33
12/31/19	1.74	1/28/20	0.45	2/25/20	0	3/24/20	0.39
1/1/20	0.13	1/29/20	1.16	2/26/20	0	3/25/20	0
1/2/20	0.62	1/30/20	1.02	2/27/20	0	3/26/20	0.01
1/3/20	0.72	1/31/20	0.98	2/28/20	0.28	3/27/20	0.39
1/4/20	0.21	2/1/20	0.79	2/29/20	0.22	3/28/20	0.59
1/5/20	0.38	2/2/20	0.3	3/1/20	0	3/29/20	0.34
1/6/20	2.57	2/3/20	0.01	3/2/20	0.48	3/30/20	0.36
1/7/20	0.48	2/4/20	1.08	3/3/20	0.29	3/31/20	0.35
1/8/20	0.09	2/5/20	0.85	3/4/20	0.01	4/1/20	0.18
1/9/20	0.01	2/6/20	1.16	3/5/20	0.56	4/2/20	0.11
1/10/20	1.39	2/7/20	0.52	3/6/20	0.01	4/3/20	0
1/11/20	0.48	2/8/20	0.08	3/7/20	0.14	4/4/20	0
1/12/20	0.38	2/9/20	0	3/8/20	0	4/5/20	0
1/13/20	0.14	2/10/20	0	3/9/20	0	4/6/20	0
1/14/20	0.15	2/11/20	0.05	3/10/20	0.12	4/7/20	0
1/15/20	0.18	2/12/20	0	3/11/20	0.04	4/8/20	0
1/16/20	0.05	2/13/20	0.19	3/12/20	0	4/9/20	0
1/17/20	0.07	2/14/20	0.25	3/13/20	0.07	4/10/20	0
1/18/20	0.6	2/15/20	0.55	3/14/20	0	4/11/20	0
1/19/20	0.01	2/16/20	0.25	3/15/20	0	4/12/20	0
1/20/20	0.08	2/17/20	0.07	3/16/20	0	4/13/20	0
1/21/20	0.95	2/18/20	0	3/17/20	0	4/14/20	0.01
1/22/20	2.56	2/19/20	0	3/18/20	0	4/15/20	0.02
1/23/20	1.39	2/20/20	0	3/19/20	0	4/16/20	0
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Date 4/17/20	Inches 0	Date 5/15/20	Inches 0	Date 6/12/20	Inches 0.42	Date 7/10/20	Inches 0
4/18/20	0.01	5/16/20	0.53	6/13/20	0.24	7/11/20	0.08
4/19/20	0	5/17/20	0.03	6/14/20	0.11	7/12/20	0.01
4/20/20	0	5/18/20	0	6/15/20	0.58	7/13/20	0
4/21/20	0	5/19/20	0.02	6/16/20	0.11	7/14/20	0
4/22/20	0.45	5/20/20	0.08	6/17/20	0	7/15/20	0
4/23/20	0.01	5/21/20	0.24	6/18/20	0	7/16/20	0
4/24/20	0.18	5/22/20	0	6/19/20	0.01	7/17/20	0
4/25/20	0.53	5/23/20	0	6/20/20	0.08	7/18/20	0
4/26/20	0.3	5/24/20	0	6/21/20	0	7/19/20	0
4/27/20	0.13	5/25/20	0.27	6/22/20	0	7/20/20	0
4/28/20	0	5/26/20	0	6/23/20	0	7/21/20	0
4/29/20	0.09	5/27/20	0	6/24/20	0.03	7/22/20	0
4/30/20	0.1	5/28/20	0	6/25/20	0	7/23/20	0
5/1/20	0.01	5/29/20	0	6/26/20	0	7/24/20	0
5/2/20	0.49	5/30/20	0.08	6/27/20	0.01	7/25/20	0
5/3/20	0.05	5/31/20	0.01	6/28/20	0	7/26/20	0
5/4/20	0.02	6/1/20	0	6/29/20	0	7/27/20	0
5/5/20	0.1	6/2/20	0	6/30/20	0.03	7/28/20	0
5/6/20	0.24	6/3/20	0	7/1/20	0.25	7/29/20	0
5/7/20	0	6/4/20	0	7/2/20	0	7/30/20	0
5/8/20	0	6/5/20	0	7/3/20	0.01	7/31/20	0
5/9/20	0	6/6/20	0.32	7/4/20	0	8/1/20	0
5/10/20	0	6/7/20	0	7/5/20	0	8/2/20	0
5/11/20	0.03	6/8/20	0.19	7/6/20	0.03	8/3/20	0.16
5/12/20	0.47	6/9/20	1.15	7/7/20	0.07	8/4/20	0
5/13/20	0.12	6/10/20	0.02	7/8/20	0	8/5/20	0
5/14/20	0.11	6/11/20	0	7/9/20	0.05	8/6/20	0.12
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Date 8/7/20	Inches 0	Date 9/4/20	Inches 0	Date 10/2/20	Inches 0	Date 10/30/20	Inches 0.24
8/8/20	0.03	9/5/20	0	10/3/20	0	10/31/20	0
8/9/20	0	9/6/20	0	10/4/20	0	11/1/20	0
8/10/20	0	9/7/20	0	10/5/20	0	11/2/20	0
8/11/20	0	9/8/20	0	10/6/20	0	11/3/20	0.49
8/12/20	0	9/9/20	0	10/7/20	0	11/4/20	0.72
8/13/20	0	9/10/20	0	10/8/20	0.03	11/5/20	0.34
8/14/20	0	9/11/20	0	10/9/20	0.72	11/6/20	0
8/15/20	0	9/12/20	0	10/10/20	0.86	11/7/20	0
8/16/20	0	9/13/20	0	10/11/20	0.84	11/8/20	0
8/17/20	0	9/14/20	0.18	10/12/20	0.05	11/9/20	0.11
8/18/20	0	9/15/20	0.31	10/13/20	0.46	11/10/20	0.21
8/19/20	0.01	9/16/20	0.04	10/14/20	0.05	11/11/20	0.03
8/20/20	0.31	9/17/20	0	10/15/20	0	11/12/20	1.06
8/21/20	0.34	9/18/20	0.07	10/16/20	0.24	11/13/20	1.16
8/22/20	0	9/19/20	0.54	10/17/20	0.01	11/14/20	0.83
8/23/20	0	9/20/20	0	10/18/20	0.38	11/15/20	0.17
8/24/20	0	9/21/20	0.02	10/19/20	0.02	11/16/20	1.28
8/25/20	0	9/22/20	0	10/20/20	0.03	11/17/20	1.11
8/26/20	0	9/23/20	1.32	10/21/20	0.07	11/18/20	0.92
8/27/20	0	9/24/20	0.02	10/22/20	0	11/19/20	0.18
8/28/20	0	9/25/20	0.85	10/23/20	0.82	11/20/20	1.24
8/29/20	0	9/26/20	0.43	10/24/20	0	11/21/20	0.03
8/30/20	0.03	9/27/20	0	10/25/20	0	11/22/20	0.12
8/31/20	0.01	9/28/20	0	10/26/20	0	11/23/20	0.08
9/1/20	0	9/29/20	0	10/27/20	0	11/24/20	0.66
9/2/20	0	9/30/20	0	10/28/20	0.01	11/25/20	0.17
9/3/20	0	10/1/20	0	10/29/20	0	11/26/20	0.03
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Date 11/27/20	Inches 0.09	Date 12/25/20	Inches 0.47	Date 1/22/21	Inches 0	Date 2/19/21	Inches 0.16
11/28/20	0.03	12/26/20	0.28	1/23/21	0	2/20/21	0.27
11/29/20	0	12/27/20	0.3	1/24/21	0.51	2/21/21	0.95
11/30/20	0.54	12/28/20	0	1/25/21	0.47	2/22/21	1.35
12/1/20	0	12/29/20	0.49	1/26/21	0.35	2/23/21	0.35
12/2/20	0	12/30/20	0.91	1/27/21	0.16	2/24/21	0
12/3/20	0	12/31/20	0.41	1/28/21	0.05	2/25/21	0.61
12/4/20	0	1/1/21	0.99	1/29/21	0.06	2/26/21	0.31
12/5/20	0.03	1/2/21	2.72	1/30/21	0.4	2/27/21	0.02
12/6/20	0.09	1/3/21	0.63	1/31/21	2.24	2/28/21	0.07
12/7/20	0.11	1/4/21	1.77	2/1/21	1.29	3/1/21	0
12/8/20	0.65	1/5/21	1.52	2/2/21	1.05	3/2/21	0
12/9/20	0.03	1/6/21	0.05	2/3/21	0.12	3/3/21	0
12/10/20	0.57	1/7/21	0	2/4/21	0.21	3/4/21	0.96
12/11/20	1.14	1/8/21	0.22	2/5/21	0.23	3/5/21	0.61
12/12/20	0.09	1/9/21	0.16	2/6/21	0.13	3/6/21	0.06
12/13/20	0.42	1/10/21	0.14	2/7/21	0.09	3/7/21	0.63
12/14/20	0.04	1/11/21	2.32	2/8/21	0	3/8/21	0.02
12/15/20	0.17	1/12/21	1.89	2/9/21	0	3/9/21	0.04
12/16/20	0.65	1/13/21	0.04	2/10/21	0	3/10/21	0
12/17/20	0.32	1/14/21	0.23	2/11/21	0.17	3/11/21	0
12/18/20	0.54	1/15/21	0.06	2/12/21		3/12/21	0
12/19/20	1.2	1/16/21	0.07	2/13/21		3/13/21	0
12/20/20	0.19	1/17/21	0.15	2/14/21	0.3	3/14/21	0.3
12/21/20	1.32	1/18/21	0	2/15/21	0.65	3/15/21	0.03
12/22/20	0	1/19/21	0	2/16/21	0.18	3/16/21	0
12/23/20	0	1/20/21	0.02	2/17/21	0	3/17/21	0
12/24/20	0	1/21/21	0.05	2/18/21	0.24	3/18/21	0.18

Date 3/19/21	Inches 0.62	Date 4/16/21	Inches 0	Date 5/14/21	Inches 0	Date	Inches
3/20/21	0.14	4/17/21	0	5/15/21	0		
3/21/21	0.87	4/18/21	0	5/16/21	0		
3/22/21	0.02	4/19/21	0	5/17/21	0.07		
3/23/21	0	4/20/21	0	5/18/21	0.07		
3/24/21	0.51	4/21/21	0	5/19/21	0.01		
3/25/21	0.02	4/22/21	0	5/20/21	0		
3/26/21	0	4/23/21	0	5/21/21	0		
3/27/21	0	4/24/21	0.77	5/22/21	0		
3/28/21	0.73	4/25/21	0.17	5/23/21	0.01		
3/29/21	0.01	4/26/21	0.02	5/24/21	0.33		
3/30/21	0	4/27/21	0	5/25/21	0		
3/31/21	0	4/28/21	0	5/26/21	0.01		
4/1/21	0	4/29/21	0	5/27/21	0.4		
4/2/21	0	4/30/21	0.18	5/28/21	0.02		
4/3/21	0	5/1/21	0	5/29/21	0		
4/4/21	0	5/2/21	0	5/30/21	0		
4/5/21	0	5/3/21	0.34				
4/6/21	0	5/4/21	0				
4/7/21	0.17	5/5/21	0				
4/8/21	0.06	5/6/21	0.07				
4/9/21	0.09	5/7/21	0.11				
4/10/21	0.11	5/8/21	0.03				
4/11/21	0	5/9/21	0.05				
4/12/21	0	5/10/21	0				
4/13/21	0	5/11/21	0				
4/14/21	0	5/12/21	0				
4/15/21	0	5/13/21	0				
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